

EXHIBIT 31

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI'I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. _____

DECLARATION OF Jamie Frank Blake

Pursuant to 28 U.S.C. § 1746, I, Jamie Frank Blake, hereby declare as follows:

1. I am a resident of the State of New York. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. . If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the State University of New York as the Associate Vice Chancellor for Policy Implementation. In this role, I oversee our civics and service initiatives, which includes overseeing funds received from AmeriCorps, the Federal Agency.

3. The New York State Commission on National and Community Service (the "Commission") receives and is responsible for managing the Funds received from AmeriCorps the Federal Agency. In turn, the Commission awards those Funds to New York programs, including the two programs discussed herein. I am the Principal Investigator ("P.I.") for the two SUNY programs funded by AmeriCorps grants.

4. The State University of New York ("SUNY") applied for and received two separate AmeriCorps grants as a subgrantee from the New York State Commission for Community Service on behalf of AmeriCorps; the Empire State Service Corps and the FAFSA Completion Corps.

5. The Empire State Service Corps was awarded \$2,571,430 to support 425 SUNY students to serve in AmeriCorps. As part of the Empire State Service Corps, SUNY students commit to 300 hours of paid public service work at their college campus or in local host sites in their communities across New York State. SUNY students participating in the Empire State Service Corps serve their local community in impact areas such as K-12 tutoring, food insecurity and basic needs support, anti-hate initiatives, and peer mental health.

6. As part of serving in AmeriCorps, the students who complete 300 hours of service are eligible for an Eli Segall Education Award. This award, valued at approximately \$1,500 per student, is paid from federal AmeriCorps funds and can be used for educational expenses such as tuition, students loans, or books.

7. As part of the program, SUNY students have the opportunity to advance their education and workforce readiness, directly serve the needs of others, and build stronger communities. Students receive training, career development, networking opportunities, and the chance to gather together and learn from each other's experiences.

8. SUNY System Administration has two full-time staff who work on the Empire State Service Corps and whose employment is funded one hundred percent through AmeriCorps grants. In addition, there are 42 SUNY campuses across New York state with students participating in the program. Campuses receive administrative funds for the program to support extra service time for campus personnel who administer the program, transportation costs, and other operating expenses related to the program.

9. SUNY is set to launch 150 additional students to serve in the Summer Corps at 89 community-based organizations across the entire state of New York.

10. SUNY recently submitted a mid-year report to AmeriCorps for the program outcomes. Through this reporting, the K-12 tutoring corps has worked with nearly 600 K-12 students in one-to-one or small group tutoring; the peer mental health corps has worked with over 2,300 college students and near peers on sub-clinical mental health support addressing the youth mental health crisis; and the food insecurity corps has served over 2,000 individuals at campus food pantries or by helping them to gain access to the SNAP (Supplemental Nutrition Assistance Program). In the past six months, the Empire State Service Corps students have supported the

needs of over 5,600 New Yorkers at more than 105 community organizations across the state of New York.

11. The loss of funding to support the Empire State Service Corps would jeopardize the success of the program and the critical support provided by the program to New Yorkers across the State. The elimination of this funding would have a profound negative impact on the State University; on any of the students who can no longer receive the promised education award; and on the communities and individuals being served.

12. SUNY also received a grant for the FAFSA Completion Corps. SUNY receives \$399,870 to support this program.

13. The Free Application for Federal Student Aid (FAFSA) is the form students and their families complete in order to access state and federal financial aid. According to an analysis by the National College Attainment Network (NCAN), the high school class of 2022 left about \$3.6 billion in Pell Grants unclaimed by not completing the FAFSA; in New York State, \$200 million was left unclaimed in Pell Grants. The FAFSA Completion Corps was created to help high school students and their families to complete the FAFSA and to ensure that each eligible student received as much college financial support as possible in order to make college affordable.

14. There are 50 students serving in the FAFSA Corps at 12 SUNY campuses in every region of the state. The students receive training, career development opportunities, and (similar to the Empire State Service Corps), students who complete 300 hours of service can earn an AmeriCorps education award.

15. The AmeriCorps funds are used to support administrative costs on campuses for the program such as extra service time for personnel and transportation costs. In addition, they


support extra-service time for a SUNY System Administration staff member who supports the program.

16. The FAFSA Corps members have supported nearly 1,000 individual high school students and their families in completing the FAFSA form.

17. Without the AmeriCorps funds, the FAFSA Completion Corps, which plays an important role in ensuring that students are able to access college financial aid, would be in jeopardy. The elimination of this funding would have a profound negative impact on the State University; on any of the SUNY students who can no longer receive the promised education award; and on the high school seniors who will not receive needed financial assistance for college.

18. It is my firm belief and declaration that the reduction in the New York State Commission's grant funding presents a serious threat to the operational integrity and timely execution of these important initiatives.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025 in Albany, New York.


Jamie Frank Blake
Associate Vice-Chancellor for Policy
Implementation for the State University of New
York